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9 Attorney for *Mario Castro*

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 MARIO CASTRO,

16 Defendant.

Case No. 2:19-cr-00295-GMN-NJK

**SEVENTH STIPULATION TO  
MODIFY CONDITIONS OF  
RELEASE**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson  
18 United States Attorney, and Department of Justice Trial Attorney Timothy T. Finley, counsel  
19 for government, and Richard E. Tanasi, counsel for defendant Mario Castro, that Mr. Castro's  
20 conditions of release be modified to permit him to visit his elderly mother at his co-  
21 defendant/brother's home.

22 This Stipulation is entered into for the following reasons:

23 1. On August 18, 2020, the parties stipulated to Mario Castro's temporary pretrial  
24 release based, in part, on Mr. Castro's health condition and the transmission of COVID-19 at  
25 the Nevada Southern Detention Center. ECF No. 134. The parties proposed several conditions  
26 for Mr. Castro's release. *Id.*

1           2.     On August 26, 2020, the Court granted Mr. Castro's pretrial release on  
2 conditions, one of which required him to maintain employment. ECF No. 137 and 141 at p. 5.

3           3.     Defendant Mario Castro and Defendant Miguel Castro are brothers. Their  
4 mother is 93 years old. She recently injured her hip. She is recovering at Defendant Miguel  
5 Castro's home. Defendant Mario Castro requests permission to visit his mother at co-defendant  
6 Miguel Castro's home twice per week for two hours each time.

7           4.     Counsel for Mr. Castro has contacted his supervising pretrial services officer, Officer  
8 McKillip, who has no objection to Mr. Castro's request. The government also does not oppose  
9 this request.

10           DATED this 8<sup>th</sup> day of March 2023.

11           By /s/ Richard Tanasi

12           RICHARD TANASI  
13           Counsel for Defendant

                  By /s/ Timothy T. Finley

                  TIMOTHY T. FINLEY  
                  Counsel for Government

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1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

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6 MARIO CASTRO,

7 Defendant.

Case No. 2:19-cr-00295-GMN-NJK

8 **PROPOSED ORDER**

9 Pending before the Court is the parties' seventh stipulation to modify conditions of  
10 pretrial release. The parties ask the Court to modify Defendant's pretrial release conditions to  
11 permit him to visit his mother at co-defendant Miguel Castro's home twice per week for two  
12 hours each time. The parties submit that Defendant's Pretrial Services Officer does not object  
13 to this request.

14 IT IS ORDERED that the parties' stipulation, is hereby GRANTED.

15 DATED this 8 day of March 2023.

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18 UNITED STATES DISTRICT COURT JUDGE  
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**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that he is an employee of Tanasi Law Offices for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on March 8, 2023, he served an electronic copy of the above and foregoing **SEVENTH STIPULATION TO MODIFY CONDITIONS OF RELEASE** by electronic service (ECF) to the person named below:

CHRISTOPHER CHIOU  
Acting United States Attorney  
DANIEL E. ZYTNICK  
TIMOTHY FINLEY  
U.S. Department of Justice  
450 5th Street N.W. #6400  
Washington, DC 20044

/s/ Richard Tanasi  
Employee of the Tanasi Law Offices